

WILMER, CUTLER & PICKERING

2445 M STREET N.W.

WASHINGTON, DC 20037-1420

TELEPHONE +1 (202) 663 6000

FACSIMILE +1 (202) 663 6363

WWW.WILMER.COM

WASHINGTON
NEW YORK
BALTIMORE
NORTHERN VIRGINIA
LONDON
BRUSSELS
BERLINPOLLY B. SMOTHERGILL
(202) 663 6706
POLLY.SMOTHERGILL@WILMER.COM

October 28, 2003

RECEIVED

OCT 28 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**BY HAND**

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc.
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

Re: *WorldCom and AT&T v. Verizon,*
CC Docket Nos. 00-218, 00-251

Dear Ms. Dortch:

Enclosed for filing please find an original and three copies of Verizon Virginia Inc.'s ("Verizon VA") Declaration of Patrick A. Garzillo, which explains the specific changes Verizon VA made to its cost studies in compliance with the August 29, 2003, Memorandum Opinion and Order (the "*Order*") in the above-captioned proceeding, and the attached summary of rates calculated in compliance with the *Order*.

Verizon VA today is also providing copies of its proprietary cost studies to Commission Staff and the parties to this proceeding, in both hard copy and CD format. The cost studies consist of three CDs containing the following materials:

- CD 1 VCost Development System and Loop Cost Analysis Model^{1/}
- CD 2: Verizon VA Compliance Cost Studies
- CD 3 SCIS and CCSICIS models and supporting files

^{1/} Pursuant to the *Order*, Verizon VA's Loop Cost Analysis Model ("LCAM") was not used to calculate compliance rates for unbundled loops. However, the VCost model was used as part of Verizon VA's compliance cost studies, and LCAM cannot be extracted from the CD containing Vcost

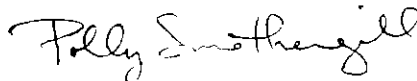
c/13

Ms. Marlene H. Dortch
October 28, 2003
Page 2

Although these CDs contain primarily proprietary materials, CDs 1 and 3 include certain non-proprietary documents, including cost model user guides and manuals. The proprietary and non-proprietary materials are inextricably linked on the CDs, and thus no non-proprietary version of those CDs can be readily produced for filing. However, Verizon VA previously filed these non-proprietary documents with the Commission (and served them on the parties) on July 2, 2001, with Verizon VA's initial cost study filing. Accordingly, and because the documents are voluminous (totaling over two thousand pages), Verizon VA is not filing a supplemental copy of those documents at this time.

Please call me if you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "Polly B. Smothergill".

Polly B. Smothergill
Attorney for Verizon Virginia Inc.

Enclosures

cc: Tamara Preiss and Steve Morris (7 proprietary copies, 7 electronic copies, 1 public copy)
Mark Keffer (1 proprietary copy, 1 electronic copy, 1 public copy)
Allen Feifield (1 proprietary copy, 1 electronic copy, 1 public copy)
David Levy (1 proprietary copy, 1 electronic copy, 1 public copy)
Mark Schneider (1 proprietary copy, 1 electronic copy, 1 public copy)

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Compliance Cost Studies, and Declaration of Patrick Garzillo, were served by hand delivery via courier this 28th day of October, 2003, to:

Tamara Preiss
Federal Communications Commission
Pricing Policy Division
Wireline Competition Bureau
445 12th Street, SW
Washington, D C 20554

Mark A. Keffer
Dan W. Long
Stephanie Baldanzi
AT&T
3033 Chain Bridge Road
Oakton, Virginia 22185

Steven Morris
Federal Communications Commission
Pricing Policy Division
Wireline Competition Bureau
445 12th Street, SW
Washington, D C 20554

Allen Feinfeld, Esq.
Kimberly Wild
WorldCom, Inc.
1133 19th Street, N.W.
Washington, D.C. 20036

David Levy
Sidley, Austin, Brown & Wood
1501 K Street, N.W.
Washington, D.C. 20005

Mark Schneider
Jenner & Block LLC
601 Thirteenth Street, N.W.
Washington, D.C. 20005


John Meehan